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via FAX (212) 805-7991
Honorable J. Paul Oetken
U.S. District Court - Southern District of New York
500 Pearl St.
Courtroom: 15D
New York, NY 10007-1312

APPLICATION GRANTED:

HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

9-21-12

Re: United States v. Zemlyansky, et al., 12 Cr. 171 (JPO)
Modification of Mark Shapiro Pre-Trial Release/Bail Requirements

Dear Judge Oetken:

I represent Dr. Mark Shapiro in the above-entitled action. I write to you today requesting that you modify the terms of Dr. Shapiro's Appearance Bond and Pre-Trial Release. I have discussed this matter with AUSAs Daniel Goldman and Nicholas McQuaid, and Carolina Fornos, and Lisa Chan of Pre-Trial Services. Pre-trial Services and the Government have consented to the relief and modification of the terms set forth herein.

Dr. Shapiro requests a modification of his pre-trial and bail conditions to include permission to travel to Florida for work purposes. Rather than submitting such requests on a case-by-case basis, as has been done numerous times since August 2012, Dr. Shapiro seeks a the modification to the terms of his release to permit business travel to and from Florida during the week. With such permission, Dr. Shapiro will advise Pre-Trial Services of his travel itinerary each time prior to his travel, and also advise Pre-Trial Services when he has returned upon the completion of each trip.

Dr. Shapiro respectfully requests that Your Honor enter an order to permit such modifications to Dr. Shapiro's initial Bail and Pre-trial Order.

Thank you in advance for your time and attention to this matter.

Very Truly Yours,

/JMD/

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cc: Mark Geldard, Esq.
Daniel Goldman, AUSA
Nicholas McQuaid, AUSA
Lisa Chan, U.S. Pretrial Services Officer